



Pacific Gas and Electric Company

*NRC/RDID record
11/23/04*

Diablo Canyon Power Plant
P.O. Box 56
Avila Beach, CA 93424
800.545.6000

November 15, 2004

PG&E Letter DCL-04-159

*10/14/04
69 FR 61019
14*

Michael T. Lesar, Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration, Mail Stop: T-6D59
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Proposed Generic Communication: Establishing and Maintaining a Safety Conscious Work Environment (69 FR 61049, October 14, 2004)

Dear Mr. Lesar:

The subject Federal Register notice requested comments on a proposed generic communication to provide guidance for licensees regarding establishing and maintaining a safety conscious work environment (SCWE). By letter dated November 15, 2004, the Nuclear Energy Institute (NEI) submitted comments on the proposed generic communication. PG&E has reviewed the NEI letter, and endorses the comments made by NEI.

PG&E participated in the development of comments submitted by the STARS (Strategic Teaming and Resource Sharing) alliance. Those comments are contained in STARS Letter STARS-04020, dated November 15, 2004. STARS is an alliance of six plants (eleven nuclear units) operated by TXU Power, AmerenUE, Wolf Creek Nuclear Operating Corporation, Pacific Gas and Electric Company, STP Nuclear Operating Company, and Arizona Public Service Company.

PG&E is concerned about the potential mis-application of the guidance in the RIS. The RIS should clearly note that it is not creating new requirements or definitions and is not changing the requirements and definitions that already exist. This RIS could easily become a "de facto" regulatory requirement. Stronger statements are needed to clearly state that the RIS should not be used as inspection guidance. The RIS needs to make it clear that not employing one or more of the actions or activities in the RIS does not make a SCWE program deficient. Licensees should not be put in the position of having to defend why one or more actions or activities listed in the RIS were not performed. Also, many of the suggested actions or activities are burdensome and resource intensive, and may not be practicable or appropriate for every licensee.

E-RIDS = ADM-03

A member of the STARS (Strategic Teaming and Resource Sharing) Alliance
Callaway • Comanche Peak • Diablo Canyon • Palo Verde • South Texas Project • Wolf Creek

Template = ADM-013

*Cell = A. MARELEY (AWM)
SISP Review complete*



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PG&E appreciates the opportunity to comment on the proposed generic communication. If there are any questions, please contact me at (805) 545-4720 or sck3@pge.com.

Sincerely,

A handwritten signature in black ink that reads 'Stan Ketelsen'.

Stan Ketelsen
Manager, Regulatory Services

cc: Nuclear Energy Institute